

# Exhibit D

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

In re Terrorist Attacks on September 11, 2001	03 MDL 1570 (GBD) (FM) ECF Case
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*This document relates to:*

*Kathleen Ashton, et al. v. Al Qaeda Islamic Army, et al., Case No. 02 Civ. 6977  
Thomas Burnett, Sr., et al. v. Al Baraka Inv. & Dev. Corp., et al., No. 03 Civ. 9849  
Federal Insurance Co., et al. v. Al Qaida, et al., No. 03 Civ. 6978  
Estate of John P. O'Neill, Sr., et al. v. Al Baraka, et al., No. 04 Civ. 1923  
Continental Casualty Co., et al. v. Al Qaeda, et al., No. 04 Civ. 5970  
Cantor Fitzgerald & Co., et al. v. Akida Bank Private Ltd, et al., No. 04 Civ. 7065  
Euro Brokers Inc., et al., v. Al Baraka, et al., No. 04 Civ. 7279*

**PLAINTIFFS' SUPPLEMENTAL REQUESTS FOR PRODUCTION  
OF DOCUMENTS DIRECTED TO DEFENDANTS  
AL HARAMAIN and PIROUZ SEDAGHATY a/k/a PETE SEDA**

THE MDL 1570 PLAINTIFFS'  
EXECUTIVE COMMITTEES  
July 31, 2012

**PLAINTIFFS' SUPPLEMENTAL REQUESTS FOR PRODUCTION  
OF DOCUMENTS DIRECTED TO DEFENDANTS  
AL HARAMAIN and PIROUZ SEDAGHATY a/k/a PETE SEDA**

Plaintiffs in *Kathleen Ashton, et al. v. Al Qaeda Islamic Army, et al.*, Case No. 02 Civ. 6977, *Thomas Burnett, Sr., et al. v. Al Baraka Inv. & Dev. Corp., et al.*, Case No. 03 Civ. 9849, *Federal Insurance Co., et al. v. al Qaida, et al.*, Case No. 03 Civ. 6978, *Estate of John P. O'Neill, Sr., et al. v. Al Baraka, et al.*, Case No. 04 Civ. 1923, *Continental Casualty Co., et al. v. Al Qaeda, et al.*, Case No. 04 Civ. 5970, *Cantor Fitzgerald & Co., et al. v. Akida Bank Private Ltd, et al.*, Case No. 04 Civ. 7065, and *Euro Brokers Inc., et al., v. Al Baraka, et al.*, Case No. 04 Civ. 7279, propound and serve on defendants Al Haramain and Pirouz Sedaghaty the following Supplemental Requests for Production of Documents to be answered fully and under oath, pursuant to Rule 34 of the Federal Rules of Civil Procedure, within 30 days of their receipt.

The "Instructions" and "Definitions" set forth in the Plaintiffs' Requests for Production of Documents to Al Haramain Islamic Foundation, Inc., et al. are incorporated herein by reference, except the following definitions and instruction shall also apply:

**Supplemental Definitions**

1. The terms "Al Haramain," shall refer to the Al Haramain Islamic Foundation, Inc., and any branch office, subsidiary, affiliate, officer, director, trustee, employee, attorney, consultant, accountant, agent, alter ego, volunteer, or representative acting on the behalf of Al Haramain Islamic Foundation, in the United States or elsewhere. Unless specified otherwise, the term is to include the headquarters of Al Haramain in Saudi Arabia, the U.S. branch office of Al Haramain, and any other branch office of Al Haramain worldwide.
2. The term "Sedaghaty" shall refer to the Pirouz Sedaghaty, a/k/a Pete Seda.
3. The terms "Defendants," "You," and "Your" shall refer to both Al Haramain and Sedaghaty, both individually and collectively.

2. The term “Oregon branch office of Al Haramain” shall refer to the entirety of the property located at 3800 S. Hwy. 99, Ashland, Oregon.

Supplemental Instruction

1. This set of Supplemental Requests for Production of Documents is propounded simultaneously on Defendants Al Haramain and Sedaghaty and both are independently instructed to answer each request.

**PLAINTIFFS' SUPPLEMENTAL REQUESTS FOR PRODUCTION  
OF DOCUMENTS DIRECTED TO DEFENDANTS  
AL HARAMAIN and PIROUZ SEDAGHATY a/k/a PETE SEDA**

1. Please provide all documents concerning business, religious, and/or operational relationship(s) between Al Haramain and the Qur'an Foundation, including but not limited to, their common purposes, missions, and organizational/operational cooperation.

**ANSWER:**

2. Please provide all documents seized by the U.S. government from the Oregon branch office Al Haramain, including but not limited to all of the documents and things referenced in the Government's Opposition to Defendant's Supplement to Motion for a New Trial, at 16-18, Docket Entry No. 536, in *United States v. Pirouz Sedaghaty*, No. 6:05-cr-60008-HO (D. Ore., Feb. 18, 2011), including, but not limited to, the following items that were specifically referenced as having been returned to the defendant:

- a. 3,800 single pages of itemized discovery, including investigative reports;
- b. 43,000 pages of bank and Al Haramain corporate records, scanned and produced electronically to the Defendant by the government;
- c. Boxes of video tapes seized from the Oregon branch office of Al Haramain; and
- d. Complete copies of hard drives seized from the Oregon branch office of Al Haramain.

**ANSWER:**

3. Please provide all documents concerning electronic mail communications to and/or from Defendants, including, but not limited to, using the following electronic mail domains: qf.org, islam-is.com, therarborist.com, hotmail.com, and alharamain.org.

**ANSWER:**

4. Please provide all electronic mails from hard drives from the Oregon branch office of Al Haramain, including, but not limited to, electronic mails to and/or from

- a. Sedaghaty;
- b. Soliman al Buthe;
- c. Mansour Al Kadi;
- d. Aqeel Al Aqeel;
- e. Abdul Qaadir Abdul Khaaliq via his various email addresses, including any via qoqaz.net, azzam.net, or any other email addresses; and
- f. any other employee or other representative of Al Haramain.

**ANSWER:**

5. Please provide all employee records and time sheets of employees and volunteers of Al Haramain.

**ANSWER:**

6. Please provide all documents concerning the database of names Defendants collected as part of Defendants' prison *Dawa* program, as referenced in the September 19, 2006 testimony of Daveed Gartenstein-Ross, titled "Prison Radicalization: Are Terrorist Cells Forming in U.S. Cell Blocks?" before the Senate Homeland Security and Governmental Affairs Committee, at pages 4-5.

**ANSWER:**

7. Please provide all documents concerning communications and/or any financial or other business relations between or among Al Haramain and any of the following:

- a. Islamic Assembly of North America;
- b. The Islamic Center of Springfield, Missouri ("ICSM");
- c. Deen Eberle, while he was an Al Haramain employee at a mosque in Springfield, Missouri;
- d. Islamic Foundation of America and/or Yusuf Estes; and
- e. Kamran Bokhari.

**ANSWER:**

8. Please provide all documents concerning the Ihsan School in Syracuse, NY, including but not limited to tax documents, curriculum information, and documents concerning Al Haramain's ownership interest in the Ihsan School in Syracuse, NY.

**ANSWER:**

9. Please provide all general ledgers and other financial documents prepared for Defendants by or at the direction of accountant Tom Wilcox for the years since 1997.

**ANSWER:**

10. Please provide all communications concerning Defendants between Defendants and accountant Tom Wilcox for the years since 1997.

**ANSWER:**

11. Please provide minutes of meetings of the Al Haramain Saudi Arabia U.S. Committee in Riyadh.

**ANSWER:**

12. Please provide copies of checks, and any documents concerning any such checks, written by Defendants to the Western Somali Relief Agency, Inc., including specifically, but not limited to, any checks to the Western Somali Relief Agency in March 2000.

**ANSWER:**



13. Please provide all documents concerning a Saudi government audit of all of Al Haramain's branches worldwide after Al Haramain headquarters in Saudi Arabia was purported to have been closed.

**ANSWER:**

14. Please provide all documents concerning travel to the U.S. of any Al Haramain representative, including, but not limited to, Soliman Al Buthe, Mansour Al Kadi, and Aqeel al Aqeel, and including, but not limited to, trips to Oregon, or Missouri, or elsewhere in the U.S.

**ANSWER:**

15. Please provide copies of checks written on all Al Haramain financial accounts for the years since 1997.

**ANSWER:**

16. Please provide all documents concerning all financial transactions from 1997-2004 for the Oregon branch office or Al Haramain.

**ANSWER:**

17. Please provide all documents concerning Defendants' ownership interest, roles, and responsibilities in the mosque located at 2151 East Division Street, Springfield, Missouri.

**ANSWER:**

18. Please provide all documents concerning all financial transactions from 1997-2004 concerning the mosque located at 2151 East Division Street, Springfield, Missouri.

**ANSWER:**

19. Please provide all documents concerning the shared projects of Al Haramain, Al Haramain Charitable Foundation, the Islamic Assembly of North America, and the Islamic Center of Southern Missouri, including, but not limited to, electronic mails between Soliman Al Buthe and Sami Hussayen.

**ANSWER:**

20. Please provide all documents concerning lectures, sermons, letters to the editor, and interviews of Abu Salman Deya-ud-Deen Eberle while he was an employee of Al Haramain at the mosque at 2151 East Division Street, Springfield, Missouri.

**ANSWER:**

21. Please provide all documents concerning the sermons and lessons given at the Oregon branch of Al Haramain, including, but not limited to, those mentioned by Barbara Cabral in her testimony at the trial of Sedaghaty, which sermons were reported to have caused a split within the congregation attending the mosque at 2151 East Division Street, Springfield, Missouri.

**ANSWER:**

22. Please provide all documents concerning a fundraiser for Chechnya by Raya Shoktford, including, but not limited to, correspondence, electronic mails, and checks.

**ANSWER:**

23. Please provide all documents concerning Defendants' involvement with Datapact, an entity registered in Oregon with Sedaghaty identified as an owner, along with two other partners, Ferhad Erdogan and Soliman Al Buthe.

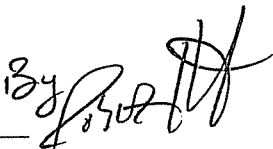
**ANSWER:**

24. Please provide all documents concerning any financial transactions involving Defendants and Datapact.

**ANSWER:**

Dated: July 31, 2012

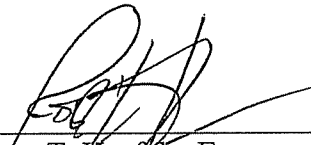
Respectfully submitted,

MDL 1570 PEC's By   
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THE MDL 1570 PLAINTIFFS'  
EXECUTIVE COMMITTEES

**CERTIFICATE OF SERVICE**

I hereby certify that a true copy of the PLAINTIFFS' SUPPLEMENTAL REQUESTS FOR PRODUCTION OF DOCUMENTS DIRECTED TO DEFENDANTS AL HARAMAIN and PIROUZ SEDAGHATY a/k/a PETE SEDA was served via electronic mail this 31th day of July 2012, upon:

Alan R. Kabat, Esq.  
Bernabei & Wachtel, PLLC  
1775 T Street, N.W.  
Washington, D.C. 20009-7124  
(Counsel for Al Haramain and Defendants' Executive Committee's appointed representative to receive discovery requests and responses in 03-MDL-1570)

  
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Robert T. Haefele, Esq.